

Received & Inspected

NOV 27 2017

November 20, 2017

FCC Mailroom

Federal Communications Commission
Marlene H. Dortch – Commission Secretary
445 12th Street SW
Washington DC 20554

RE: Filing of Docket 06-36

Dear Ms. Dortch:

Please find four (4) original sets of the Telspirion USA, LLC CPNI 2016 Certification under Docket 06-36 for 2016.

Please file these reports for us.

Two (2) courtesy copies have been mailed under separate to the enforcement division as well.

Sincerely,

R S Ashton Authorized Signatory

Attachments

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Pocesian & Inspector

Annual 64.2009(e) CPNI Certification for 2016

Date filed: November 20, 2017

Name of company covered by this certification: Telspirion USA, LLC

Form 499 Filer ID: 823074

Name of signatory: R S Ashton

Title of signatory: Authorized Signatory

I, R S Ashton, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Telspirion USA

R S Ashton Authorized Signatory

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Telspirion USA, LLC Customer Proprietary Information Policy

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Telspirion USA Policy for the Protection of Customer Proprietary Information is based on compliance with the FCC CPNI rules.

Telspirion will implement stricter procedures to verify their identity if they want to discuss their account.

In the past, customers calling Telspirion's customer service could discuss their services and billings with a Telspirion representative, once that representative had verified the caller's identity. The verification was usually done through questions about account information known to Telspirion and the customer or through verification methods such as social security number. This authentication practice will continue with respect to calls made to Telspirion's customer service centers

Telspirion will not discuss call-detail information with a Customer holder *unless* the caller provides the pre-established password to the Telspirion representative. Each Telephone or VOIP Customer will be provided an initial "password", which will allow Telspirion to discuss their Telephone or VOIP account details. Consumer customer can request personalized passwords or password changes, only having passed the initial password test.

Telspirion will notify Customers on certain account changes, such as whenever a password or other form of authentication (such as a "secret question and answer") is created or changed, Telspirion will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, Telspirion will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

Telspirion will provide notification to a Customer at their billing address of any changes to their password,

Telspirion does NOT provide its customer information to any third parties or affiliates and only to law enforcement agencies with a valid subpoena or duly authorized 911 Emergency or Public Safety entities. Telspirion does not use external 3rd party brokers, marketing or other manner of marketing.

Telspirion Employees shall have only limited access to customer information in the Telspirion databases, and only executive management shall have unrestricted access. Telspirion does not sell or otherwise make available CPNI data to any 3rd parties and complies with all State and Federal CPNI rules and regulations.

Questions or comments should be directed to Telspirion at legal.services@telspirion.net.

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